

## **Deficiency Progress Report- Update 1**

Submitted: July 22, 2010

To complete the evaluation process, Cal/EPA requires the CUPAs to submit Deficiency Progress Reports that explain the CUPA's progress towards correcting the identified deficiencies. Deficiency Progress Reports are due every 90 days after the evaluation date until all deficiencies have been corrected.

**CUPA:** City of Santa Rosa Fire Department

**Evaluation Date:** May 13 and 14, 2009

**Evaluators:**

Cal/EPA: Ernie Genter

SWRCB: Terry Snyder

CalEMA: Jack Harrah

OFSM: Jennifer Lorenzo

DTSC: Mark Pear

**Date Update 1 submitted:** July 22, 2010

**Deficiencies corrected with Update 1:** 2 and 3

**Deficiencies remaining:** 1

**Next Update due date:** October 18, 2010

**Deficiency 1:** The CUPA is not accurately tracking and reporting all items required on their Annual Inspection Summary Report 3 and the Annual Enforcement Summary Report 4.

**Preliminary Corrective Action(s):** By September 30, 2010, while the CUPA continues to update and improve their database management system, the CUPA will ensure that the information reported on the Annual Inspection Summary Report 3, the Annual Enforcement Summary Report 4 and the Semi-Annual UST Report 6 will be complete. Before submittal of the reports, the CUPA will verify that the data reported are as accurate as possible.

**CUPA Corrective Action, (Update 1):** The CUPA is continuing to work on the accuracy of tracking and reporting the inspection summary data and will submit a complete summary on Sept 30, 2010.

**Cal/EPA Response and SWRCB Response:** *The SWRCB and Cal/EPA appreciate the effort that the CUPA is making to improve their annual and semi-annual reporting. We look forward to the complete summary which will be submitted in September. Please note: the next Report 6 for the January – June 2010 period is due September 1, 2010.*

**Deficiency 2:** The CUPA has incorporated the annual California Accidental Release Prevention (CalARP) performance audit into the annual Title 27 self-audit. This is fine, but one of the elements of the performance audit has been omitted - stationary sources that have been exempted from the provisions of the CalARP program.

**Preliminary Corrective Action(s):** If the Title 27 self-audit is to suffice as the CalARP performance audit, as well, then, beginning with the upcoming 2009-2010 self-audit, the CUPA must ensure that all eight of the elements of 19 CCR 2780.5(b) are addressed, even if the answer is "no" or "none."

**CUPA Corrective Action, (Update 1):** The CUPA has created a template to assure all eight elements of the CAL-ARP self audit are included in the submission of the report.

**Cal EMA Response:** *Thank you for the update. Cal EMA considers this deficiency corrected.*

**Deficiency 3:** While the Santa Rosa City Fire Department has reported RCRA LQG data (inspections, violations and enforcement actions) annually on the Annual Report 3 and 4, they have not reported the information on a quarterly basis to DTSC.

**Preliminary Corrective Action(s):** The Santa Rosa City Fire Department CUPA shall begin reporting LQG data on a quarterly basis beginning with the next quarterly update on May 1st to Chuck McLaughlin DTSC 8800 Cal-Center Drive, Sacramento, CA 95826.

**CUPA Corrective Action, (Update 1):** The CUPA has reported the LQG data to the State as required to meet the quarterly submission requirement. The next quarterly report from the CUPA to DTSC will be Aug. 2010

**DTSC Response:** *DTSC appreciates the CUPA's efforts and considers this deficiency corrected.*